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**AMERICAN SOCIETY
OF SAFETY ENGINEERS**

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DEPT OF TRANSPORTATION

COMM - ANN: 27

December 30, 1999

U.S. Department of Transportation (DOT)
Research and Special Programs Administration (RSPA)
Attn: DOT Dockets Office, Room POL-401
Docket #RSPA-99-6355-10
400 Seventh Street, SW
Plaza Room #401
Washington, DC 20590-0001

RSPA PROPOSAL - SAFETY AND HEALTH ISSUES

The purpose of this letter is to provide comment from the American Society of Safety Engineers (ASSE) addressing the RSPA 10/21 Federal Register request for comments on: *Pipeline Safety, Enhanced Safety and Environmental Protection for Gas Transmission and Hazardous Liquid Pipelines in High Consequence Areas*. To this end, we present the following:

Introduction

The American Society of Safety Engineers (ASSE), is the oldest and largest Society of Safety Professionals in the world. Founded in 1911, ASSE represents almost 33,000 dedicated safety professionals. Included in this membership are Certified Safety Professionals, Professional Engineers, agronomists, academicians, fire protection engineers, system safety experts, industrial hygienists, physicians, occupational nurses, and an impressive collection of other disciplines, skills, and backgrounds. We pride ourselves on our dedication to excellence, expertise, and commitment to the protection of people, property, and environment on a world-wide basis.

ASSE serves as Secretariat of seven (7) American National Standards Institute Committees (ANSI) developing safety and health standards which are used by private sector organizations as well as state/Federal governmental agencies such as MSHA, OSHA, etc... ASSE members also sit on over forty (40) additional standards development committees and the Society sponsors educational sessions on standards development. The Society also has eleven (11) technical divisions consisting of: Construction, Consultants, Engineering, Environmental, Health Care, International, Management, Public Sector, Risk Management and Insurance, Mining, and Transportation. The ASSE members included in these divisions are leaders in their field with the knowledge and expertise needed to move safety and health forward on a global level. We have also attached a fact sheet on the Society for your review, (Attachment # 1).

Commentary Insights

The intent of ASSE is not to speak either for or against the proposal, but rather to make comments based upon our member views, existing data, and anecdotal information. Based upon this collective insight, we submit the following:

Our first comment is to ask if the RSPA has considered working with the U.S. Chemical Safety and Hazard Investigation Board (CSB) on this issue. The CSB might have data, history, and expertise that be of value in addressing some of the technical issues discussed in the summary and background section of the proposal. Our suggestion is that RSPA should discuss this issue with CSB board members and staff to see if there can be a way to support each others efforts. It would also make sense for RSPA to work out a protocol for investigations with the CSB. The CSB has improved its synergy with other Federal issues, and this might be another which should be considered as well.

Our recommendation is that RSPA should continue to increase its outreach to local emergency response organizations and industry when addressing this issue. Local emergency response organizations and industry officials have significant experience and

expertise to share. One area where they could specifically offer insight is in addressing hands-on training and competence for emergency response teams. We have found little guidance in standards/regulations specifying what competencies a hazardous materials response organization should be required to meet. ASSE members commented this is a significant issue for companies that contract for such initiatives. The concern is that while there is some guidance for the individual competence of responders, the issue of organizational requirements is not addressed. This might be an area RSPA should be interested in addressing.

We also note that RSPA is addressing safety related functions requiring high levels of technical knowledge and expertise. Perhaps RSPA should consider reviewing the level of professional safety competence required to perform some of these functions. If RSPA does choose to review the issue of competence, we point out that ASSE is the secretariat for the American National Standard, *Z590 Criteria for Establishing Levels of Competence and Certification in the Safety Profession*. When this draft standard is approved we suggest that the Agency consider using the standard as a model for evaluating professional development programs for safety and health professionals working with pipeline related issues. Finally, ASSE strongly supports the concept of recognizing accredited certification. We have included a packet of information on the Board of Certified Safety Professionals (BCSP) as an indicator of what constitutes a high caliber accredited certification.

ASSE also notes that RSPA dedicates little to any text indicating how the agency intends to work with voluntary national consensus standards development organizations like ANSI, ASTM, NFPA, etc.. . It would make sense for RSPA to review current voluntary national consensus standards and consider incorporating them by reference in future initiatives. OMB A- 119 and Public Law 104- 113 call for the increased utilization of voluntary national consensus standards. It would make sense to us to have some type of plan to accommodate the increased usage of voluntary national consensus standards. This is especially true since a review of the ANSI catalog indicates that there are many

voluntary national consensus standards which could impact this initiative, (e.g.: ANSI/ASME B-30 Series, catalog listing attached).

We thank you for your attention to this matter, and look forward to working with you in the future. If you should have any questions or issues please do not hesitate to contact the Society.

Regards,

A handwritten signature in black ink, appearing to read 'F. Perry', with a stylized, flowing script.

Frank H. Perry, CSP, PE
Society President, 1999-2000

Copy To: ASSE Board of Directors
 ASSE Council on Professional Affairs
 ASSE Governmental Affairs Committee
 ASSE Contact List

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encl.



American Society of Safety Engineers

*protecting
people,
property
and the
environment
since 1911*

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About the Society

Founded in 1911, the American Society of Safety Engineers (ASSE) is the world's oldest and largest professional safety organization. ASSE's mission is to foster the technical, scientific, managerial and ethical knowledge, skills and competency of safety, health and environmental professionals for the protection of people, property and the environment, and to advance the status and promote the advancement of the safety profession.

The Society's 32,600 members manage, supervise and consult on safety, health and environmental issues in industry, insurance, government and education. Safety professionals help prevent accidents, injuries and occupational diseases; create safer environments for work and leisure; and develop safe products in all areas of human activity.

Currently, ASSE is guided by a 15-member Board of Directors, which consists of eight regional vice presidents; three council vice presidents; and the Society president, president-elect, senior vice president, vice president of finance and executive director. The Board is guided in decision-making by five standing committees and four councils on - Practices & Standards, Professional Affairs, Professional Development and Member/Region Affairs.

Networking Nationally

ASSE has 149 chapters, 55 sections and 54 student sections within eight regions nationwide. Chapters offer localized membership services, networking and professional development opportunities through seminars, conferences, meetings and newsletters.

Through its 12 divisions, ASSE offers professional development opportunities and technical assistance in various career paths. These divisions are: construction, consultants, engineering, environmental, healthcare, industrial hygiene, international, management, mining, public sector, risk management/insurance and transportation.

Providing Quality Education

ASSE members gain year-round opportunities for professional development through focused seminars, self-study programs, technical publications, CD-ROM training and computer resources. The Society also holds an annual Professional Development Conference and Exposition in June.

ASSE awards continuing education units (CEUs) to seminar, symposia and conference attendees, and to self-study program participants in order to maintain their Certified Safety Professional (CSP) designation. Many of the Society's education programs offer CM points to satisfy maintenance requirements for CIH designations. The Society provides on-site seminars to corporations and government entities internationally; and jointly sponsors programs with other organizations.

Serving Members

To serve the unique needs of safety professionals, ASSE provides the following membership services:

- *Professional Safety* Journal and *Society Update* Newsletter
- Representation in Legislative and Regulatory Issues
- Industry Standards-Making Process
- Academic Standards for Safety Education
- Continuing Education Training Seminars
- Leadership Conference for Chapter Officers
- JobLine Employment Service and Membership Directory
- Professional Development Conference and Exposition
- Technical Publications
- Occupational Safety and Health, Industrial Hygiene and Ergonomics Self-Study Courses*
- Full-Motion, Interactive CD-ROM Training

- Localized Networking and Professional Recognition,
- Insurance Programs (Group Medical & Professional Liability)
- * Approved for college credit by the American Council on Education

Setting the Standard

As secretariat for seven American National Standards Institute accredited committees, the Society continues to expand its role in the standards-making process. The standards are: A1264.1 Safety Requirements for Workplace Floor and Wall Openings, Stairs and Railing Systems; Z87.1 Eye and Face Protection; Z117.1 Safety Requirements for Confined Spaces; Z359.1 Fall Arrest Systems, Subsystems and Components; Z390.1 Accepted Practices for Hydrogen Sulfide (H₂S) Safety Training Programs; Z490.1 Criteria for Best Practices in Safety, Health and Environmental Training; and Z590 Criteria for Establishing Levels of Competence and Certification in the Safety Profession.

Through its activities at the university level, the Academic Accreditation Council, now the Professional Educational Standards Committee, works to maintain a high standard of preparation for future safety professionals and ensures that the content of academic programs is relevant to the needs of the safety profession and the constituencies it serves.

As a member of the Accreditation Board for Engineering & Technology (ABET), ASSE encourages the incorporation of safety principles and courses into engineering program curricula nationwide and establishes curriculum standards for associate, baccalaureate and master's degree programs. ASSE also participates in site visits to colleges and universities to accredit safety programs. ABET and ASSE have accredited 11 baccalaureate and master's safety degree programs nationwide.

ASSE maintains a strong commitment to professional certification via participation on the Board of Certified Safety Professionals. To help individuals earn the CSP designation, the Society offers the CSP Refresher Guide and in-depth continuing education and training seminars,

which are held throughout the year at metropolitan locations nationwide. In addition, self-study courses are offered to help individuals prepare for specialty examinations, maintain professional credentials or obtain college credit.

Recognizing Excellence

Outstanding accomplishments in the safety and health profession, are recognized through a variety of awards programs. The highest honor, ASSE Fellow, honors individuals with broad, significant, career-long contributions to the profession and the Society. Other awards include the Edgar Monsanto Queeny Safety Professional of the Year Award, J&H Marsh & McLennan Scrivener Editorial Award and Veterans of Safety Professional Paper Awards.

Student awards include the Zurich Commercial Insurance John E. Anderson Safety Student of the Year Award, Safety Equipment Distributors Association (SEDA) Scholarships, Mine Safety Appliances Company Outstanding Student Section Award and J&H Marsh & McLennan Student Paper Awards. ASSE also sponsors Charles V. Culbertson Outstanding Volunteer Service Awards, President's Awards, Chapter Achievement Program and Long-Service Recognition.

Speaking Out

To ensure that safety and health remain a key focus for the country, Patton Boggs L.L.P. continues to represent ASSE's national legislative and regulatory interests in Washington, D.C.

The Society prepares position statements in response to, and in anticipation of, important safety and health legislation and regulation, and publishes regular "ASSE Perspectives," monthly "Regulatory News" and bi-monthly "Governmental Affairs" columns in *Professional Safety Journal*. The Governmental Affairs Committee (GAC) also publishes ASSE positions and correspondence on the Society's web site (<http://www.ASSE.org>).

The Society enhances the image of the safety profession and its practitioners via extensive communications programs and by maintaining frequent contact with the safety and health trade press. ASSE also conducts research on various topics, including compensation and needs assessments.

Shaping the Future

ASSE takes an active role in shaping the future of the safety profession. The Intersociety Relations Committee maintains a liaison with other professional societies and groups worldwide that share concerns, goals and strategies which impact members and the profession at large.

The GAC maintains ongoing contact with government agencies including the Occupational Safety and Health Administration, Environmental Protection Agency, Consumer Product Safety Commission, National Highway Traffic Safety Administration and the National Institute for Occupational Safety and Health.

Recognizing growth in the profession, as well as a need for even more comprehensive services, ASSE's Board of Directors chartered the ASSE Foundation in 1990. Designed to provide professional development and financial resources to qualified individuals and non-profit organizations, the Foundation seeks to advance safety and health development, research and education in the public interest. The Foundation's long-range vision is to provide scholarships and research for the safety profession.



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AMERICAN NATIONAL STANDARDS INSTITUTE

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*Catalog
of American
National
Standards*



ANSI/ASME (cont'd)

- ANSI/ASME B18.13-1995**, Screw and Washer Assemblies – SEMS (Inch Series), \$38.00
- ANSI/ASME B18.13.1M-I 991**, Screws and Washer Assemblies – SEMS (Metric Series), \$50.00
- ANSI/ASME B18.15-1985 (R1995)**, Forged Eyebolts, \$28.00
- ANSI/ASME B18.16.1M-1979 (R1995)**, Hex Nuts and Hex Flange Nuts, Mechanical and Performance Requirements for Prevailing-Torque Type Steel, Metric (reaffirmation and redesignation of ANSI B18.16.1M-1979 (R1986)), \$28.00
- ANSI/ASME B18.16.2M-1979 (R1995)**, Hex Nuts and Hex Flange Nuts, Torque-Tension Test Requirements for Prevailing-Torque Type Steel, Metric (reaffirmation and redesignation of ANSI B18.16.2M-1979 (R1986)), \$28.00
- ANSI/ASME B18.18.1M-I 987 (R1994)**, General Purpose Fasteners, Inspection and Quality Assurance for, \$28.00
- ANSI/ASME B18.18.2M-1987 (R1993)**, Machine Assembly Fasteners, Inspection and Quality Assurance for High Volume, \$28.00
- ANSI/ASME B18.18.3M-1987 (R1993)**, Special Purpose Fasteners, Inspection and Quality Assurance for, \$28.00
- ANSI/ASME B18.18.4M-1987 (R1993)**, Fasteners for Highly Specialized Engineered Applications, Inspection and Quality Assurance for, \$28.00
- ANSI/ASME B18.21.1-1994**, Lock Washers (Inch Series), \$40.00
- ANSI/ASME B18.21.2M-1994**, Lock Washers (Metric Series), \$40.00
- ♦ **ANSI/ASME B18.24.1-1996**, Part Identifying Number (PIN) Code System Standard for B18 Externally Threaded Products, NA
- ANSI/ASME B18.25.1M-I 996**, Square and Rectangular Keys and Keyways, \$42.00
- ANSI/ASME B18.25.2M-1996**, Woodruff Keys & Keyways, \$42.00
- ANSI/ASME B18.29.1-1993**, Helical Coil Screw Thread Inserts – Free Running and Screw Locking (Inch Series) (includes revision service), \$35.00
- ♦ **ANSI/ASME B19.1-1995**, Safety Standard for Air Compressor Systems (includes revision service), \$65.00
- ANSI/ASME B19.3-1991**, Safety Standard for Compressors for Process Industries (includes revision service), \$45.00
- ANSI/ASME B20.1-1993**, Safety Standard for Conveyors and Related Equipment (includes revision service), \$68.00
- ANSI/ASME B29.1M-1993**, Precision Power Transmission Roller Chains, Attachments, and Sprockets, \$40.00
- ANSI/ASME B29.3M-1994**, Double-Pitch Power Transmission Roller Chains and Sprockets, \$40.00
- ANSI/ASME B29.4M-1994**, Double-Pitch Conveyor Roller Chains, Attachments, and Sprockets, \$38.00
- ANSI/ASME B29.6M-1993**, Steel Detachable Link Chains, Attachments, and

ANSI/ASME (cont'd)

- Sprockets (revision and redesignation of ANSI B29.6M-1983), \$42.00
- ANSI/ASME B29.8M-1993**, Leaf Chain, Clevises, and Sheaves, \$34.00
- ANSI/ASME B29.10M-1994**, Heavy Duty Offset Sidebar Transmission Roller Chains and Sprocket Teeth (revision and redesignation of ANSI B29.10M-1981), \$40.00
- ANSI/ASME B29.11M-1994**, Combination Chains, Attachments, and Sprocket Teeth, \$40.00
- ANSI/ASME B29.12M-1983 (R1988)**, Steel Bushed Rollerless Chains, Attachments, and Sprocket Teeth, \$28.00
- ♦ **ANSI/ASME B29.14M-1996**, "H"-Type Mill Chains, Attachments, and Sprocket Teeth, \$40.00
- ANSI/ASME B29.15M-1995**, Steel Roller Type Conveyor Chains, Attachments, and Sprocket Teeth (revision and redesignation of ANSI B29.15M-1973 (R1987)), \$40.00
- ANSI/ASME B29.16M-1995**, Welded Steel Type Mill Chains, Attachments, and Sprocket Teeth (revision and redesignation of ANSI B29.16M-1981), \$40.00
- ANSI/ASME B29.17M-1983 (R1995)**, Hinge Type Flat Top Conveyor Chains and Sprocket Teeth, \$28.00
- ANSI/ASME B29.18M-1993**, Welded Steel-Type Drag Chains, Attachments, and Sprocket Teeth (revision and redesignation of ANSI B29.18M-1981), \$38.00
- ANSI/ASME B29.19-1993**, A and CA550 and 620 Roller Chains, Attachments, and Sprockets (revision and redesignation of ANSI B29.19-1976), \$38.00
- ♦ **ANSI/ASME B29.21M-1996**, 700 Class Welded Steel and Cast Chains, Attachments, and Sprockets for Water and Sewage Treatment Plants (revision and redesignation of ANSI B29.21M-1981 (R1987)), \$40.00
- ANSI/ASME B29.22M-1995**, Drop Forged Rivetless Chains, Sprocket Teeth Drive Chain/Drive Dogs (revision and redesignation of ANSI B29.22M-1980 (R1987)), \$40.00
- ANSI/ASME B29.23M-1985 (R1995)**, Flexible Chain Couplings, \$28.00
- ANSI/ASME B29.24M-1995**, Roller Load Chains for Overhead Hoists, \$40.00
- ANSI/ASME B29.25M-1994**, Open Barrel Steel Pintle-Type Conveyor Chains, Attachments, and Sprockets, \$37.00
- ♦ **ANSI/ASME B29.26M-1996**, Fatigue Testing Power Transmission Roller Chain, NA
- ANSI/ASME B30.1-1992**, Jacks (includes revision service), \$56.00
- ♦ **ANSI/ASME B30.2-1996**, Overhead and Gantry Cranes (Top Running Bridge, Single or Multiple Girder, Top Running Trolley Hoist) (includes revision service), \$75.00
- ♦ **ANSI/ASME B30.3-1996**, Hammerhead Tower Cranes (includes revision service), \$75.00
- ANSI/ASME B30.4-1990**, Portal, Tower, and Pillar Cranes (includes revision service), \$40.00

ANSI/ASME (cont'd)

- ANSI/ASME B30.5-1994**, Mobile and Locomotive Cranes (includes revision service), \$75.00
- ANSI/ASME B30.6-1995**, Derricks (includes revision service), \$60.00
- ANSI/ASME B30.7-1994**, Base Mounted Drum Hoists (includes revision service), \$75.00
- ANSI/ASME B30.8-1993**, Floating Cranes and Floating Derricks (includes revision service), \$56.00
- ♦ **ANSI/ASME B30.9-1996**, Slings (includes revision service), \$100.00
- ANSI/ASME B30.10-1993**, Hooks (includes revision service), \$50.00
- ANSI/ASME B30.11-1993**, Monorails and Underhung Cranes (includes revision service), \$60.00
- ANSI/ASME B30.12-1992**, Handlift Loads Suspended from Rotorcraft (includes revision service), \$50.00
- ♦ **ANSI/ASME B30.13-1996**, Storage/Retrieval (S/R) Machines and Associated Equipment (includes revision service), \$60.00
- ♦ **ANSI/ASME B30.14-1996**, Safety Standard for Side Boom Tractors (includes revision service), \$60.00
- ANSI/ASME B30.16-1993**, Overhead Hoists (Underhung) (includes revision service), \$60.00
- ANSI/ASME B30.17-1992**, Overhead and Gantry Cranes (Top Running Bridge, Single Girder, Underhung Hoist) (includes revision service), \$55.00
- ANSI/ASME B30.18-1993**, Stacker Cranes (Top or Under Running Bridge, Multiple Girder with Top or Under Running Trolley Hoist) (includes revision service), \$56.00
- ANSI/ASME B30.19-1993**, Cableways (includes revision service), \$60.00
- ANSI/ASME B30.20-1993**, Below-the-Hook Lifting Devices (includes revision service), \$65.00
- ANSI/ASME B30.21-1994**, Manually Lever Operated Hoists (includes revision service), \$55.00
- ANSI/ASME B30.22-1993**, Articulating Boom Cranes (includes revision service), \$65.00
- ANSI/ASME B31G-I 991**, Manual for Determining the Remaining Strength of Corroded Pipelines, \$30.00
- ANSI/ASME B31.1-1995**, Power Piping (includes revision service), \$175.00
- ♦ **ANSI/ASME B31.3-1996**, Process Piping (includes revision service), \$265.00
- ANSI/ASME B31.4-1992**, Liquid Transportation Systems for Hydrocarbons, Liquid Petroleum Gas, Anhydrous Ammonia, and Alcohols (includes revision service), \$90.00
- ANSI/ASME B31.5-1992**, Refrigeration Piping (includes revision service), \$70.00
- ANSI/ASME B31.8-1995**, Gas Transmission and Distribution Piping Systems (includes revision service), \$140.00
- ♦ **ANSI/ASME B31.9-1996**, Building Services Piping Code (includes revision service), \$75.00
- ANSI/ASME B31.11-I 989**, Slurry Transportation Piping Systems (includes revision service), \$90.00